

ORIGINAL

**From:**

Grubert Espinoza  
9543 Roosevelt Avenue  
Jackson Heights NY 11372

**To:**

UNITED STATES DISTRICT COURT  
For the Eastern District of New York  
Clerk's office



Case 1:21-cv-01713-WFKJ-PK  
Civil Action No. 21cv1713

Omar Near, individual and on behalf of others  
Similarly situated,  
Plaintiff(s)  
v.  
Neo Mobil INC. (d/b/a NEO MOBILE) and  
Grubert Espinoza  
Defendant

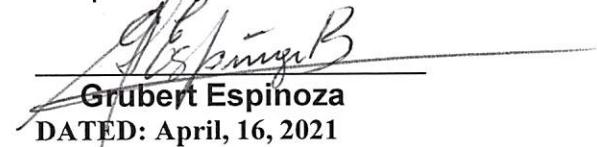
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MOTION FOR EXTENSION OF TIME TO FILE BRIEF:

The Respondent, Mr. Grubert Espinoza, hereby moves this Court to grant a motion for Extension of time to file Respondent's (Brief) which is currently due on April 22th, 2021. The reason Respondent request an extension, is due to the fact that respondent received briefing notice April 01, 2021. Therefor respondent like time to gather the necessary information and conduct a research to complete the entire proceedings / the court allows with submitting a brief. Respondent request that such motion be granted for the following reasons: Respondent is without the help of counsel, therefor I am requesting for more time (30 days) to find a counsel in preparing brief if necessary, with the help of one available. Respondent is working diligently to prepare due timely ordered.

In the interest of Mr. Grubert Espinoza case and with respect this action other responsibilities, respondent submits that good cause for an extension of (Brief) motion has been demonstrated and respectfully requests that such motion be granted, and to submit in this case. Respondent is requesting for an additional of time to complete the preparation and submit with the help and assistant of Counsel his brief.

Respectfully Submitted

  
Grubert Espinoza  
DATED: April, 16, 2021